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17 Attorneys for Defendant
18 BLUE CROSS OF CALIFORNIA dba ANTHEM
19 BLUE CROSS

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRIS W. & JENNIFER W.,

Plaintiffs,

v.

PROVIDENCE HEALTH PLAN; BLUE
CROSS OF CALIFORNIA dba ANTHEM
BLUE CROSS; and DOES 1 through 10,

Defendants.

Case No. 3:20-cv-04491-JCS

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

Judge: Hon. James Donato

Current response date: September 14, 2020

New response date: October 5, 2020

1 Pursuant to Northern District of California Local Rule 6-1(b), Plaintiffs Chris W. and
2 Jennifer W. ("Plaintiffs") and Defendant Blue Cross of California dba Anthem Blue Cross
3 ("Anthem"), by and through their counsel of record, respectfully submit this Stipulation and
4 Proposed Order to extend time to respond to Plaintiffs' complaint from September 14, 2020 to
5 October 5, 2020. In support of this stipulation, the Parties state as follows:

6 1. This Complaint was filed on July 7, 2020.

7 2. Plaintiffs mailed a Request for Service of Summons to Anthem on July 16, 2020,
8 Anthem returned the Request for Service of Summons to Plaintiffs on July 22, 2020, making
9 Anthem's current deadline to respond to the Complaint September 14, 2020.

10 3. The Plaintiffs and Anthem have met and conferred, and have agreed to extend the
11 date upon which Defendant's responsive pleading is due to October 5, 2020.

12 4. Plaintiff and Anthem have stipulated to extend the deadline for Anthem to respond
13 to response to the Complaint from September 14, 2020 to October 5, 2020 for purposes of
14 exploring potential early resolution of these claims prior to incurring further attorneys' fees and
15 litigation expenses.

16 5. This is the first request for an extension for this responsive pleading, and the
17 requested extension is not expected to prejudice either party.

18 9. Pursuant to Northern District of California Local Rule 6-2, and for good cause, the
19 Parties hereby stipulate and respectfully request that this Court extend the time Anthem to
20 respond to the Complaint to October 5, 2020.

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1 Dated: September 3, 2020

2 TROUTMAN PEPPER HAMILTON
3 SANDERS LLP

4 By: /s/ Chad S. Fuller

5 Chad Fuller
6 Jenna Uyen Nguyen
7 Attorneys for Defendant
8 BLUE CROSS OF CALIFORNIA dba
9 ANTHEM BLUE CROSS

10 Dated: September 3, 2020

11 DL LAW GROUP

12 By: /s/ David M. Lilienstein

13 David M. Lilienstein
14 Katie J. Spielman
15 Attorneys for Plaintiffs
16 CHRIS W. & JENNIFER W.

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Filer's Attestation: Pursuant to Civil L.R. 5-1(i)(3) regarding signatures,
Chad R. Fuller hereby attests that concurrence in the filing of this document and
its content has been obtained from all signatories listed.

1 **[PROPOSED] ORDER**

2 IT IS SO ORDERED, Defendant Blue Cross Of California dba Anthem Blue Cross's
3 response to the Complaint shall be filed by October 5, 2020.

4 ORDERED this 4th day of September, 2020.

5 _____
6 The Honorable James Donato
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